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*Admitted NY, EDNY & SDNY

May 3, 2022

VIA ECF

Honorable Colleen McMahon
United States District Court Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

OK
Colleen McMahon
5/4/2022

Re: Elvia Perez-Victorio et al. v. City of New York et al., 19 CV 421 (CM)(GWG)

Dear Honorable Judge McMahon:

MEMO ENDORSED

This office represents the Plaintiff in the above-referenced matter. We respectfully write to request an Extension of Time to file the Final Joint Pre-Trial Order. Said request is on consent with the Defendant City of New York.

The Civil Case Management Plan that Your Honor So Ordered on August 1, 2019, called for the Final Pre-Trial Order to be filed on or before May 2, 2020. (See Docket No. 22) Subsequent to that Your Honor granted Plaintiff's requests to extend discovery. (See Docket Nos. 32 and 35) In addition, when Defendant made an application for an extension of time to file Motions for Summary Judgment Your Honor indicated that until we see that the Complaint is amended all dates were adjourned sine die. (See Docket No. 42) In the Court's written decision denying Plaintiff's Motion for Leave to Amend the Complaint, Your Honor referenced that the Court expected the Final Pre-Trial Order to be filed by today, May 3, 2022. (See Docket 53 at page 8) Since said decision, Your Honor, did So Order a briefing schedule for the filing of a Motion for Summary Judgment. (See Docket No. 55) Neither Plaintiff nor Defendant were aware that Your Honor had previously selected the date of May 3, 2022, for the filing of the Final Pre-Trial Order. As a result of the foregoing, we respectfully request an Extension of Time for the filing of the Final Pre-Trial Order to a date after the Defendant's Motion for Summary Judgment has been decided.

HONORABLE COLLEEN MCMAHON
May 3, 2022
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We thank Your Honor for any consideration given. Kindly advise should Your Honor require any additional information.

Respectfully Submitted,



LESLEY J. LANOIX

LJI:

cc: Peter W. Brocker, Esq., New York City Law Department (*Via ECF*)
Ms. Elvia Perez-Victorio